

1 COLETTE F. STONE, ESQ. (SBN: 129773)
2 RONALD F. BERESTKA, JR. ESQ. (SBN: 155707)
3 LYDIA V. KO, ESQ. (SBN: 272588)
4 STONE & ASSOCIATES
A Professional Corporation
5 2125 Ygnacio Valley Road, Suite 101
Walnut Creek, CA 94598
Telephone: (925) 938-1555
Facsimile: (925) 938-2937
Email: cstone@stonelawoffice.com
rberestka@stonelawoffice.com

7 Attorneys for Defendants,
8 GEORGE M. VLAZAKIS; MARIA BARBIS; JOHN BARBIS;
and ATHANASIA V. VLAZAKIS

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

21 | I, Maria A. Barbis, declare:

22 1. I am a defendant in a lawsuit in the California Superior Court, County of Alameda,
23 Case number RG19021463 brought by Pacific Gas & Electric Company. I have personal
24 knowledge of the facts contained in this declaration and if called to testify thereto could
25 competently do so.

26 2. My maiden name is Vlazakis. My family has owned the property with street
27 addresses of 225-229 Brush Street and 751 Third Street (APN 001-0111-001 and 001-0111-002)

1 since at least 1960 (Vlazakis property). The Vlazakis property is presently jointly owned by my
2 siblings, myself and my husband (owned in our family trust).
3

3 3. The Vlazakis property is adjacent to and shares an entire city block with the
4 PG & E property that has street addresses of 205-209 Brush Street (parcel APN 001-0111-005)
5 (PG & E property). Located on PG & E's property was a long-standing brick building that is
6 fronted on Third Street roughly to the north. The eastern-facing wall of PG & E's brick building
7 remains and runs along the property line with the Vlazakis' property and is adjacent to the
8 Vlazakis' 751 Third Street building. The 751 Third Street building including the roof was attached
9 to the brick wall, and it has been in place for at least 50 years.

10 4. Attached hereto as Exhibit 4 are true and correct copies of a series of emails
11 between me and Evelyn Soto of Craig Communications, including an attachment of documents
12 that I provided to her electronically. Ms. Soto was acting as a Project Manager on behalf of PG &
13 E, and we exchanged information in furtherance of the contract between PG & E and the
14 Vlazakises outlined in the November 22, 2017 “Letter Agreement” (attached to the PG & E’s
15 complaint (Exhibit 1) in the California state court action, Case number RG19021463). In this
16 series of emails I provided Ms. Soto with the documents required under paragraph 1 of the contract
17 regarding how we as owners of the Vlazakis family property obtained title to APNs 001-0111-001
18 and 001-0111-002. On the sixth page of this exhibit Ms. Soto acknowledged that she received the
19 documents required by paragraph 1 of the contract “that PG & E needed”.

I declare under penalty of perjury under the laws of the State of California and the United States of America that the foregoing is true and correct.

22 Executed on this 20th day of January, 2020, at Visalia, California.

Frank A. Barber

MARIA A. BARBIS

EXHIBIT 4

From: Evelyn Soto <Evelyn@craig-communications.com>
To: George Vlazakis <georgevlazakism@gmail.com>; mbarb99 <mbarb99@aol.com>
Cc: razosusana <razosusana@gmail.com>
Subject: Brush Street - Property Title Copies
Date: Mon, Nov 20, 2017 8:42 am

Good morning George,

PG&E would like you to provide us copies of the deeds that show when/how Emmanuel and Maria originally acquired title. Can you send those to me today?

Best,
Evelyn



Evelyn Soto - Project Manager
70 Washington Street, Suite 425, Oakland, CA 94607
(510) 685.3713 • craig-communications.com

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From: g <mbarb99@aol.com>
To: Evelyn <Evelyn@craig-communications.com>
Subject: Re: Brush Street - Property Title Copies
Date: Mon, Nov 20, 2017 10:28 am
Attachments: CCF20112017.pdf (1946K)

-----Original Message-----

From: Evelyn Soto <Evelyn@craig-communications.com>
To: George Vlazakis <georgevlazakism@gmail.com>; mbarb99 <mbarb99@aol.com>
Cc: razosusana <razosusana@gmail.com>
Sent: Mon, Nov 20, 2017 8:42 am
Subject: Brush Street - Property Title Copies

Good morning George,

PG&E would like you to provide us copies of the deeds that show when/how Emmanuel and Maria originally acquired title. Can you send those to me today?

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2004070317

02/18/2004 04:11 PM

OFFICIAL RECORDS OF ALAMEDA COUNTY
PATRICK O'CONNELL
RECORDING FEE:

29.00

Recording Requested by:
Bruce B. Roberts, Esq
File No. 3409.02



6 PGS

When recorded, return to:
Bruce B. Roberts
One First Street, Suite 9
Los Altos, CA 94022

APN: 1-111-1 & 1-111-2

KX
2
6
V1

AFFIDAVIT - DEATH OF TRUSTEES – SUCCESSION OF SUCCESSOR TRUSTEES

STATE OF CALIFORNIA)
COUNTY OF SANTA CLARA)ss.
)

EMMANUEL P. VLAZAKIS, MARIA A. BARBIS, ATHANASIA V. VLAZAKIS and GEORGE M. VLAZAKIS, all of legal age, being first duly sworn, depose and say:

1. That CONSTANTINE EMMANUEL VLAZAKIS and EVRIDIKI VLAZAKIS, the decedents mentioned in the attached certified copies of Certificate of Death, are the same people as CONSTANTINE VLAZAKIS and YVONNE VLAZAKIS, respectively, who were named as the Trustees of the VLAZAKIS FAMILY TRUST, under Agreement dated October 4, 1994 ("Trust" herein), in that certain Grant Deed which was recorded as Instrument No. 94328771, on October 11, 1994, in the Official Records of Alameda County, State of California covering the following described real property and improvements situated in the City of Oakland, County of Alameda, State of California.

For legal description see Exhibit A attached hereto

The within property is more commonly known as 229 Brush Street, Oakland, California

2. CONSTANTINE EMMANUEL VLAZAKIS died on August 8, 1997; and

3. EVRIDIKI VLAZAKIS died on April 7, 2001.

4. As a result of the deaths of CONSTANTINE EMMANUEL VLAZAKIS and EVRIDIKI VLAZAKIS, we, EMMANUEL P. VLAZAKIS, MARIA A. BARBIS, ATHANASIA V. VLAZAKIS and GEORGE M. VLAZAKIS, were appointed by the terms of the Trust to act as Trustees of the Trust;

5. We consented to act as successor trustees of the Trust and have assumed the powers and duties as successor trustees of such Trust;

00018879
Page 1 of 2

6. That this Affidavit is made for the protection and benefit of all persons hereafter acquiring an interest in or dealing with the Property.

Dated: DECEMBER 16, 2003

Emmanuel P. Vlazakis, Affiant

Subscribed and Sworn to before me
this 16th day of DECEMBER, 2003.

Bruce B. Roberts
Notary Public

Maria A. Barbis, Affiant

Subscribed and Sworn to before me
this 16th day of DECEMBER, 2003.

Bruce B. Roberts
Notary Public

Athenasia V. Vlazakis

ATHANASIA V. VLAZAKIS, Affiant

Subscribed and Sworn to before me
this 16th day of DECEMBER, 2003.

Bruce B. Roberts
Notary Public

George M. Vlazakis

GEORGE M. VLAZAKIS, Affiant

Subscribed and Sworn to before me
this 16th day of DECEMBER, 2003.

Bruce B. Roberts
Notary Public

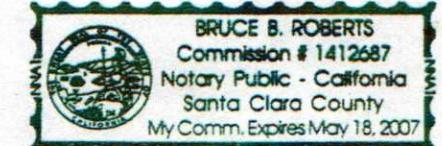
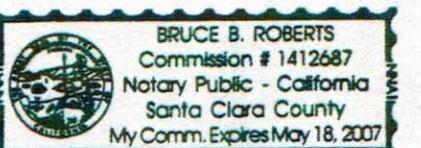
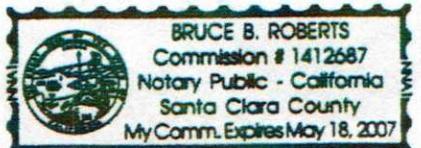
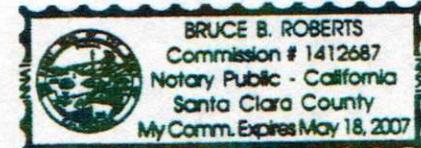


EXHIBIT "A"

APN: 1-111-1/1-111-2

Parcel One:

BEGINNING AT A POINT ON THE Western line of Brush Street, distant thereon Southerly fifty (50) feet from the intersection thereof with the Southern line of Third Street, as said streets are shown on the map hereinafter referred to; running thence Southerly along said line of Brush Street fifty (50) feet; thence at a right angle Westerly eighty-five (85) feet; thence at right angles Northerly fifty (50) feet; thence at right angles Easterly eighty-five (85) feet to the point of beginning.

BEING a portion of Block No. 101, as said block is delineated and designated upon Kellersberger's Map of Oakland, on file and of record in the office of the County Recorder of the County of Alameda.

Parcel Two:

COMMENCING at a point formed by the intersection of the Western line of Brush Street with the Southern line of 3rd Street; and running thence Southerly along said line of Brush Street, fifty (50) feet; thence at right angles Westerly eighty-five (85) feet; thence at right angles Northerly fifty (50) feet; to the Southern line of 3rd Street; and thence Easterly along said last named line eighty-five (85) feet to the point of commencement.

BEING Lots Numbered Fifteen (15) and Sixteen (16) and a portion of Lot Numbered Fourteen (14) in Block Numbered One Hundred and One (101) as per Kellersberger's Map of Oakland, on file in the office of the County Recorder of Alameda County.

3409:67.lgl

From: Evelyn Soto <Evelyn@craig-communications.com>
To: George Vlazakis <georgevlazakislaw@gmail.com>; mbarb99 <mbarb99@aol.com>
Cc: razosusana <razosusana@gmail.com>
Subject: RE: Brush Street - Property Title Copies
Date: Mon, Nov 20, 2017 1:10 pm

Hi George,

As discussed just now on the phone, Maria provided me with a copy of the grant deed that PG&E needed, thank you.

Best,
Evelyn

Evelyn Soto
C. 510.685.3713

From: Evelyn Soto
Sent: Monday, November 20, 2017 8:42 AM
To: 'George Vlazakis' <georgevlazakislaw@gmail.com>; 'mbarb99@aol.com' <mbarb99@aol.com>
Cc: razosusana@gmail.com
Subject: Brush Street - Property Title Copies
Importance: High

Good morning George,

PG&E would like you to provide us copies of the deeds that show when/how Emmanuel and Maria originally acquired title. Can you send those to me today?

Best,
Evelyn



Evelyn Soto - Project Manager
70 Washington Street, Suite 425, Oakland, CA 94607
(510) 685.3713 • craig-communications.com

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From: Evelyn Soto <Evelyn@craig-communications.com>
To: George Vlazakis <georgevlazakislaw@gmail.com>; mbarb99@aol.com <mbarb99@aol.com>
Cc: razosusana@gmail.com <razosusana@gmail.com>
Subject: S-081 Brush St Meeting Follow-up
Date: Mon, Nov 20, 2017 3:01 pm
Attachments: PGE_BrushStSharedWallTerms_20171117.pdf (178K), S-081_BrushStProjectContacts_20171117.docx (16K), S081_OakPort_LtVlazakis_20171117_Final.docx (13K)

Hello Maria and George,

Thank you for the productive meeting on Friday. We are pleased to have identified a path forward that is agreeable to all parties. For everyone's benefit below is a recap of next steps:

- In the next few days PG&E will provide you with a draft letter agreement based on the terms (attached) we reviewed at today's meeting
- You, together with Vikki, will review the agreement when received and work cooperatively with PG&E to execute it by December 5, 2017
- A list of project contacts is attached for everyone's convenience; please confirm your contact information (Maria please provide us a mailing address)
- Please sign and return the attached letter communicating your support for the proposed work

A copy of this email and attached documents, as well as future documents and communications, will be sent to Vikki via fax and mail. Vikki can return documents by email to this email address, by fax at **(510) 433-0299**, or mail at **70 Washington St., Suite 425 Oakland, CA 94606**.

Please let us know if you have any questions.

Best,

Evelyn



Evelyn Soto - Project Manager
70 Washington Street, Suite 425, Oakland, CA 94607
(510) 685.3713 • craig-communications.com